

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No.: 19-10081-IT
)	
JOVAN VAVIC,)	
)	
Defendant)	

GOVERNMENT’S PROPOSED VOIR DIRE

The government respectfully submits its proposed voir dire pursuant to the Court’s amended pretrial order. Dkt. 1022. The government respectfully submits that the Court should use the parties’ joint proposed questionnaire in *United States v. Abdelaziz*, 19-cr-10080-NMG, which was already approved by Judge Gorton and used by the clerk’s office. Attached hereto as Exhibit A, the government submits a clean version of the *Abdelaziz* questionnaire, with minimal informational revisions from the *Abdelaziz* questionnaire attached hereto as a redline in Exhibit B.

The defendant has previously submitted a proposed questionnaire that contains inappropriate and argumentative questions, such as “have you ever given something of value as a gesture, to build a reservoir of goodwill, or to cultivate a business relationship,” and “have you personally or has a close relative of yours ever been ‘conned’ or deceived by a ‘conman’ or woman.” The government respectfully submits that those questions, and the following additional questions in the defendant’s proposed questionnaire are inappropriate, duplicative, argumentative, or unduly burdensome of potential jurors’ privacy interests: 8, 11, 19, 21, 22, 36, 44, 45(a), (d), (e), (h)-(j), 46-56, 66. *See* Dkt. 865-1.

Respectfully submitted,

RACHAEL S. ROLLINS
United States Attorney

By: /s/ Ian J. Stearns
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants .

/s/ Ian J. Stearns
IAN J. STEARNS
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